



# SAN JOAQUIN FARM BUREAU FEDERATION

MEETING TODAY'S CHALLENGES / PLANNING FOR TOMORROW

October 31, 2002

Paul Marshall  
California Department of Water Resources  
Bay-Delta Office  
P.O. Box 942836  
Sacramento, CA 94236-0001

Dear Paul:

The following comments are being sent to you on behalf of the San Joaquin Farm Bureau Federation (SJFB) to the Notice of Preparation for the South Delta Improvement Program.

The proposed Clifton Court Forebay diversion rate increase must be compared against alternatives that include reclamation of brackish water and/or local water development within the importing areas.

This project must also be done in a manner that investigates and protects all beneficial interests. At a minimum, adequate water levels, quantity and quality must be maintained. Local diversions are predominately for agricultural use and any compromises to the ability to divert water could have devastating affects.

Water Quality: When water flows are altered, concentrations of chemicals and other constituents can become more concentrated, or in the case of dissolved oxygen, be lost. The proposed alterations must address the levels of all constituents in the water and ensure that they do not promote or cause, at a minimum, current standards to be exceeded (It should be noted that certain current standards do not prevent damage to agricultural production and acceptable concentrations should be based on whether or not degradation will occur). These high concentrations can cause crop damage and they could also spur new regulations for agricultural operators. Regulation that was not warranted prior to the manipulations of the flows.

Water Quantity: The volume of water in the channels must be sufficient to supply the beneficial uses that use it. In the event more water is required for increased dilution, the source of this water must be defined and the affects to its area(s) of origin must be identified and addressed.

Water Levels: In the event water levels are not adequate, pumps can be less efficient or not work at all. This will put part of the financial burden of the proposed project on the backs of the local diverters.

There is no question that when altering flows, both availability and quality can be compromised, therefore these issues must be addressed in the EIR/EIS. The EIR/EIS must ensure that the exports will not impact local diverters or fisheries and if mitigation cannot be done, exports must decrease until such protections can be provided. This EIR/EIS must ensure that any diversion modifications be done in a manner that would protect the diverter's existing water right priority. It must ensure there is an annual maintenance plan that will keep the system operating as planned. This EIR/EIS must look at the above points and any other impacts of this project on a watershed basis, the affects it will have upstream as well as downstream.

In closing, as a resource of global significance and our national security's dependence on it, there should be no higher long-term priority use of water than California's agriculture throughout the State, including the Delta.

Sincerely,

Joe Petersen  
Program Director